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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
v. :  
TIMBERLY H. GAMACHE and : Mag No. 06-8128 (MCA)  
HASSAN D. THOMAS :

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From in or about January 2006, to on or about May 25, 2006, in the District of New Jersey and elsewhere, defendants,

TIMBERLY H. GAMACHE and HASSAN D. THOMAS

did knowingly and willfully conspire and agree with each other and others to directly and indirectly, corruptly demand, seek, receive, and accept articles of value personally in return for defendant TIMBERLY H. GAMACHE being influenced in the performance of her official acts and being induced to do, and omit to do, acts in violation of her official duty, contrary to Title 18, United States Code, Sections 201(b)(2)(A) and (C).

In violation of Title 18, United States Code, Section 371.

I further state that I am a Special Agent, and that this complaint is based on the following facts:

SEE ATTACHMENT A

continued on the attached page and made a part hereof.

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Ryan Landers, Special Agent  
Department of Justice, Office of Inspector General

Sworn to before me and subscribed in my presence,

July 25, 2006, at Newark, New Jersey

HONORABLE MADELINE COX -ARLEO  
UNITED STATES MAGISTRATE JUDGE

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Signature of Judicial Officer

## **Attachment B**

I, Ryan Landers, a Special Agent with the Department of Justice, Office of Inspector General, having conducted an investigation, to include the interview of witnesses and the collection of contraband, and having spoken with other individuals, have knowledge of the following facts:

1. During the time period relevant to this complaint, defendant TIMBERLY H. GAMACHE worked at Fort Dix, New Jersey Federal Correctional Institution ("FCI Fort Dix"), as a correctional officer.

2. During the time period relevant to this complaint, defendant HASSAN D. THOMAS was an inmate at FCI Fort Dix, housed in the West Compound.

3. Through conversations with a cooperating individual ("CI 1"), I learned of a scheme whereby defendant GAMACHE agreed with defendant THOMAS to smuggle contraband into FCI Fort Dix, for inmates, in exchange for money. During the time period relevant to this complaint, CI 1 was an inmate housed at FCI Fort Dix, West Compound, and he received contraband. CI 1 agreed to cooperate in this investigation.

4. In January 2006 defendant THOMAS told CI 1 that defendant GAMACHE, who they both referred to as "Mrs. G," was bringing cellular phones and other contraband into FCI Fort Dix in exchange for cash.

5. On or about May 8, 2006, defendant THOMAS told CI 1 that defendants THOMAS and GAMACHE could sell him 2 bags of tobacco for \$1,600. CI 1 agreed to purchase the tobacco and have the \$1,600 sent by Western Union to defendant GAMACHE's husband in Browns Mills, New Jersey. Defendant THOMAS told CI 1 that CI 1 would have to provide defendant THOMAS with the Western Union wire transfer confirmation number before defendant GAMACHE would have the tobacco smuggled into FCI Fort Dix. Subsequently, CI 1 overheard defendant THOMAS call defendant GAMACHE and provide GAMACHE with the wire transfer confirmation number.

6. On or about May 10, 2006, federal agents caused \$1,483 to be wired, by Western Union, to defendant GAMACHE's husband in Browns Mills, New Jersey.

7. On or about May 11, 2006, defendant GAMACHE's husband went to the Sun's Market Western Union in Browns Mills, New Jersey and received a pay-out of \$1,483.

8. On or about May 11, 2006, CI 1 met with defendant THOMAS to inquire about the status of the tobacco. Defendant THOMAS informed CI 1 that defendant GAMACHE would not bring the tobacco into FCI Fort Dix until May 14, 2006, because defendants GAMACHE and THOMAS had other "orders" to fill before they could get to CI 1's order.

9. On or about May 14, 2006, CI 1 met defendant THOMAS in defendant THOMAS' cell and defendant THOMAS provided CI 1 with two bags of tobacco.

10. On or about May 17, 2006, defendant THOMAS and CI 1 agreed that CI 1 would purchase another bag of tobacco as well as a cellular telephone from defendants GAMACHE and THOMAS for \$2,800. Again, CI 1 agreed to have the monies sent by Western Union to defendant GAMACHE's husband, in Browns Mills, New Jersey.

11. On or about May 17, 2006, federal agents caused \$2,800 to be wired, by Western Union, to defendant GAMACHE's husband in Browns Mills, New Jersey.

12. On or about May 19, 2006, defendant GAMACHE's husband went to the County Farms Western Union in Browns Mills, New Jersey and received a pay-out of \$2,800.

13. On or about May 19, 2006, defendant THOMAS met with CI 1 and gave him a Virgin Mobile cellular telephone.

14. On or about May 20, 2006, defendant THOMAS met with CI 1 and gave him two bags of tobacco.

15. I have been informed by United States Bureau of Prisons officials that tobacco products and cellular telephones are prohibited, by regulation, from the FCI Fort Dix facility.